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BOOK CABLE

(DISTRIBUTE TO ALL EMPLOYEES)

1. THE ETHICS IN GOVERNMENT ACT OF 1978 PROVIDES THAT CERTAIN SENIOR GOVERNMENT OFFICIALS MUST FILE DETAILED REPORTS OF THEIR FINANCIAL INTERESTS FOR REVIEW BY THEIR AGENCIES TO DETERMINE THE EXISTENCE OF ANY CONFLICTS OF INTERESTS. THESE REPORTS MUST BE MADE AVAILABLE TO THE PUBLIC UPON REQUEST UNLESS THE PRESIDENT GRANTS A WAIVER IN THE NATIONAL INTEREST. THE LAW CONTEMPLATES THAT, AT A MINIMUM, THE REPORTS OF ALL UNDERCOVER EMPLOYEES WILL BE PROTECTED. SUCH A WAIVER IS NOW BEING CONSIDERED FOR [REDACTED] EMPLOYEES AND NO REPORTS WILL BE RELEASED PENDING A PRESIDENTIAL DECISION. THE ACT ALSO IMPOSES ADDITIONAL RESTRICTIONS ON POST-EMPLOYMENT CONTACTS BETWEEN FORMER EMPLOYEES AND THE GOVERNMENT. THE PURPOSE OF THIS MESSAGE IS TO PROVIDE BASIC INFORMATION TO EMPLOYEES WHO MAY BE AFFECTED.

2. SENIOR OFFICERS AND EMPLOYEES, PRIMARILY GS-16S AND ABOVE, ARE REQUIRED TO FILE ANNUAL REPORTS BY 15 MAY 79 AND INCLUDE INFORMATION AS TO THEIR FINANCIAL STATUS FOR THE PREVIOUS YEAR. THUS, A COVERED EMPLOYEE ON THE ROLLS 1 JANUARY 1979 MUST FILE A REPORT COVERING 1978. ANY COVERED INDIVIDUAL TERMINATING EMPLOYMENT MUST FILE A REPORT WITHIN 30 DAYS OF TERMINATION.

3. EMPLOYEES REQUIRED TO FILE WILL BE NOTIFIED PERSONALLY AND PROVIDED THE APPROPRIATE FORM. PURSUANT TO THE PROVISIONS OF THE

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ACT THE DEPUTY GENERAL COUNSEL IS RESPONSIBLE FOR ENSURING IMPLEMENTATION. ACCORDINGLY, ALL FINANCIAL REPORTS WILL BE SUBMITTED TO A FINANCIAL DISCLOSURE REVIEW PANEL FOR REVIEW AND DETERMINATION WHETHER THE REPORTING INDIVIDUAL IS IN COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS. THE PANEL, COMPRISED OF MEMBERS REPRESENTING EACH DIRECTORATE, WILL DETERMINE WHETHER ADDITIONAL INFORMATION IS REQUIRED TO BE SUBMITTED AND AFFORD A REASONABLE OPPORTUNITY TO DISPUTE ANY FINDINGS.

4. [] IS RESPONSIBLE FOR REPORTING TO THE ATTORNEY GENERAL ANY INDIVIDUAL WHO KNOWINGLY AND WILLFULLY FALSIFIES OR FAILS TO REPORT ANY INFORMATION REQUIRED TO BE REPORTED. THE COURTS MAY ASSESS A MAXIMUM PENALTY OF \$5,000, BUT ADMINISTRATIVE SANCTIONS ARE ALSO AUTHORIZED. [] REGULATIONS WILL BE REVISED APPROPRIATELY.

5. THE ACT ALSO PLACES CERTAIN RESTRICTIONS ON THE ACTIVITIES OF EMPLOYEES WHO LEAVE GOVERNMENT SERVICE AFTER 30 JUNE 1979. THE NEW LAW, WHICH IMPOSES CRIMINAL PENALTIES FOR CERTAIN POST-EMPLOYMENT ACTIVITY, PROHIBITS FORMER GOVERNMENT EMPLOYEES FROM REPRESENTING OTHERS IN CONNECTION WITH ANY PARTICULAR MATTER THAT INVOLVES A SPECIFIC PARTY OR PARTIES AND IN WHICH THE UNITED STATES IS A PARTY OR HAS A DIRECT AND SUBSTANTIAL INTEREST. THE RESTRICTION IS INDEFINITE IF THE FORMER EMPLOYEE PARTICIPATED ON THAT MATTER PERSONALLY AND SUBSTANTIALLY WHILE A GOVERNMENT EMPLOYEE, BUT LASTS TWO YEARS IF THE MATTER WAS ONLY WITHIN THE EMPLOYEE'S OFFICIAL RESPONSIBILITY WITHIN ONE YEAR PRIOR TO THE TERMINATION OF THAT RESPONSIBILITY.

6. THE LAW ALSO IMPOSES ADDITIONAL RESTRICTIONS UPON CERTAIN PERSONS FORMERLY SERVING IN POSITIONS OF GS-17 AND ABOVE. SUCH OFFICIALS MAY NOT FOR ONE YEAR AFTER THEIR EMPLOYMENT HAS CEASED REPRESENT ANYONE BEFORE, OR ATTEMPT TO INFLUENCE, THEIR FORMER AGENCIES ON MATTERS EITHER PENDING BEFORE THEM OR IN WHICH THE AGENCIES HAVE A DIRECT AND SUBSTANTIAL INTEREST. FINALLY, SUCH OFFICIALS MAY NOT FOR TWO YEARS ADVISE, CONSULT, OR ASSIST ANYONE CONCERNING AN APPEARANCE BEFORE ANY GOVERNMENT AGENCY IN CONNECTION WITH CERTAIN MATTERS THAT INVOLVE A SPECIFIC PARTY OR PARTIES AND THAT WERE PENDING WITHIN THE FORMER EMPLOYEE'S OFFICIAL RESPONSIBILITIES WITHIN ONE YEAR PRIOR TO THE TERMINATION OF THE EMPLOYMENT GIVING RISE TO THOSE RESPONSIBILITIES.

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7. THE OBJECTIVE OF THIS LEGISLATION IS TO CLOSE THE "REVOLVING DOOR" BETWEEN BUSINESS AND THE GOVERNMENT TO PRECLUDE EVEN THE APPEARANCE OF UNDUE INFLUENCE OR UNFAIR ADVANTAGE. THE LAW DOES NOT PROHIBIT FORMER EMPLOYEES FROM ACTING ON THEIR OWN BEHALF ON PERSONAL MATTERS, FROM EXPRESSING PERSONAL VIEWS WHERE THE FORMER EMPLOYEE HAS NO MONETARY INTEREST, FROM RESPONDING TO A FORMER AGENCY'S REQUEST FOR INFORMATION, OR PARTICIPATING AS THE PRINCIPAL RESEARCHER UNDER FEDERAL GRANTS. IT PRECLUDES AN EMPLOYEE FROM "SHIFTING SIDES" IN THE CONDUCT OF GOVERNMENT BUSINESS. THE MORE EXTENSIVE THE INVOLVEMENT OF THE OFFICIAL IN GOVERNMENT BUSINESS, THE GREATER THE RESTRICTION WILL BE ON THE OFFICIAL'S LATER INVOLVEMENT IN THOSE MATTERS AFTER LEAVING GOVERNMENT SERVICE.

8. UNFORTUNATELY, AT THIS TIME, THERE ARE MANY UNCERTAINTIES AND UNANSWERED QUESTIONS ABOUT THE PRECISE MEANING AND SCOPE OF THESE RESTRICTIONS. FOR EXAMPLE, THE SCOPE OF ONE OF THE MOST RESTRICTIVE AND CONTROVERSIAL PROVISIONS OF THE ACT, WHICH ON ITS FACE APPEARS TO PROHIBIT CERTAIN FORMER EMPLOYEES (THOSE AT GS-17 AND ABOVE), FOR A PERIOD OF TWO YEARS FOLLOWING TERMINATION OF THEIR EMPLOYMENT, FROM EVEN ADVISING, ASSISTING, OR CONSULTING ON A RANGE OF MATTERS THAT WERE WITHIN THEIR OFFICIAL RESPONSIBILITIES, IS CURRENTLY BEING SERIOUSLY DEBATED WITH THE ADMINISTRATION AND IN CONGRESS, AND LEGISLATION HAS BEEN INTRODUCED TO SOFTEN THE IMPACT OF THE RESTRICTIONS. THE ADMINISTRATION FEELS CONFIDENT OF THE BILL'S PASSAGE, BUT IT IS NOT POSSIBLE TO ACCURATELY PREDICT THE OUTCOME OF THAT DEBATE.

9. THE OFFICE OF GENERAL COUNSEL IS THE FOCAL POINT WITHIN [REDACTED] FOR THE ADMINISTRATION AND INTERPRETATION OF THIS LAW. REQUESTS FOR FURTHER INFORMATION SHOULD BE SLUGGED [REDACTED] HQS SHALL ATTEMPT TO INFORM YOU OF ANY SIGNIFICANT DEVELOPMENTS IN THIS LAW AS SOON AS THEY OCCUR.

10. ALL REPORTS WILL BE CLASSIFIED CONFIDENTIAL AND POUCHED TO HQS VIA A TRANSMITTAL MANIFEST WITH ATTACHMENTS UNDER SEPARATE COVER. THE TM SHOULD BE ADDRESSED TO FINANCIAL DISCLOSURE REVIEW PANEL, HEADQUARTERS. THE ENVELOPE CONTAINING THE SEPARATE COVER ATTACHMENT TO THE TM SHOULD BE SEALED AND ADDRESSED AS FOLLOWS "SEPARATE COVER ATTACHMENT TO TM (GIVE NUMBER) TO FINANCIAL DISCLOSURE REVIEW PANEL HEADQUARTERS. IN UPPER LEFT HAND CORNER LIST TRUE NAME AND LOCATION OF EMPLOYEE. IN LOWER RIGHT HAND CORNER "TO BE OPENED BY ADDRESSEE

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ONLY." CLASSIFY THE ENVELOPE CONFIDENTIAL. FOLLOWING ARE INSTRUCTIONS FOR FILLING OUT THE HEADING OF THE REPORT ON PAGE THREE.

ITEM A. NAME: USE TRUE NAME.

ITEM G. TERMINATION DATE (IF APPLICABLE): LEAVE BLANK UNLESS EMPLOYEE RESIGNS OR RETIRES [REDACTED] IN WHICH CASE THE DATE OF RESIGNATION/RETIREMENT SHOULD BE GIVEN. ITEMS B THRU F -- LEAVE BLANK ON REPORTING FORM, PROVIDE DATA KEYED TO REPORT FORM BY CABLE SLUGGED [REDACTED] AND INCLUDE THE FOLLOWING INFORMATION:

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B. POSITION FOR WHICH FILING -- GIVE YOUR CURRENT POSITION TITLE AND GS LEVEL.

C. DEPARTMENT OR AGENCY IF APPLICABLE -- GIVE AGENCY.

D. DATE OF APPOINTMENT TO PRESENT POSITION -- GIVE YOUR DATE OF ARRIVAL AT YOUR CURRENT POST.

E. POSITIONS HELD DURING THE PRECEDING CALENDAR YEAR (IF DIFFERENT FROM PRESENT POSITION). GIVE POSITION TITLE(S) FOR OTHER POSITIONS HELD DURING THE CALENDAR YEAR FOR WHICH REPORTING.

F. DATES OF EMPLOYMENT IN POSITION(S) -- GIVE DATES FOR POSITIONS LISTED IN ITEM E.

11. EACH EMPLOYEE WHO IS REQUIRED TO FILE A REPORT SHOULD RECEIVE ONE PRIOR TO 15 MAY. IF NOT, HE OR SHE SHOULD ADVISE HQS BY CABLE. HEADQUARTERS REGRETS THE SHORT DEADLINE FOR FILING THE REPORT AND REALIZES THAT IN SOME CASES IT MAY NOT BE POSSIBLE TO MEET IT. IF AN EMPLOYEE IS FOR VALID REASONS NOT ABLE TO POUCH REPORT ON OR PRIOR TO 15 MAY 1979, HE OR SHE SHOULD ADVISE HQS BY CABLE, SLUGGED [REDACTED] OF THE REASON FOR THE DELAY AND THE DATE ON WHICH THE REPORT WILL BE POUCHED. A BEST EFFORT TO COMPLY WITH THE PROVISIONS OF THE LAW IS DEEMED ACCEPTABLE INSOFAR AS THE INITIAL REPORT IS CONCERNED, HOWEVER, ALL REPORTS MUST BE SUBMITTED BY 15 JUNE 1979. IN FUTURE YEARS, REPORTS MUST BE SUBMITTED BY THE ANNUAL DEADLINE OF 15 MAY.

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